

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

TROY E. TILLERSON,

\*

Plaintiff,

\*

vs.

CASE NO. 3:05-00985-MEF-DRB

THE MEGA LIFE AND HEALTH  
INSURANCE CORPORATION, a  
corporation; TRANSAMERICA LIFE  
INSURANCE COMPANY F/K/A PFL  
LIFE INSURANCE COMPANY, a  
corporation; NATIONAL ASSOCIATION  
FOR THE SELF EMPLOYED A/K/A  
NASE, a corporation,

\*

Defendants.

\*

**JOINT MOTION FOR PROTECTIVE ORDER**

COME NOW, the parties and respectfully present a proposed protective order, and as support for the Court's entry of same, say as follows:

“Protected health information” is relevant to the claims or defenses presented in this lawsuit. Thus, in accordance with the requirements of the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), Pub. L. No. 104-191, 110 Stat. 1936 (1996), and regulations promulgated thereto, the parties respectfully present to the Court the attached proposed “Qualified HIPAA Protective Order,” to be entered by stipulation of counsel for all parties.

WHEREFORE, premises considered, the parties jointly request that the Court enter the attached protective order with respect to HIPAA.

Date: February 2, 2006.

This is e-signed by agreement of all parties.

*s/ Steven W. Couch*

STEVEN W. COUCH  
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*s/ Pamela A. Moore*

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